



Service of Process Transmittal

04/08/2022

CT Log Number 541368610

TO: KIM LUNDY- EMAIL
Walmart Inc.
GLOBAL GOVERNANCE/CENTRAL INTAKE, 2914 SE I STREET MS#0200
BENTONVILLE, AR 72712-3148

RE: Process Served in South Carolina

FOR: Wal-Mart Stores, Inc. (Former Name) (Domestic State: DE)
WALMART INC. (True Name)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: Moseley Sarah // To: WALMART INC.

DOCUMENT(S) SERVED: Letter, Summons, Complaint

COURT/AGENCY: Greenwood County Court of Common Pleas, SC
Case # 2022CP2400284

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition - 04/08/2019,
Store #6887, at 300 Bypass 25 NE, Greenwood, South Carolina 29646

ON WHOM PROCESS WAS SERVED: CT Corporation System, Columbia, SC

DATE AND HOUR OF SERVICE: By Certified Mail on 04/08/2022 postmarked on 04/01/2022

JURISDICTION SERVED : South Carolina

APPEARANCE OR ANSWER DUE: Within 30 days after service, excluding the date of service

ATTORNEY(S) / SENDER(S): Jon E. Newlon
McCravy Newlon & Sturke Law Firm, P.A.
1629 ByPass 72 NE
Greenwood, SC 29649
864-388-9100

ACTION ITEMS: CT has retained the current log, Retain Date: 04/08/2022, Expected Purge Date:
04/18/2022

Image SOP

REGISTERED AGENT ADDRESS: C T Corporation System
2 Office Park Court
Suite 103
Columbia, SC 29223

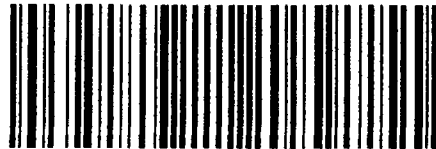
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

CERTIFIED MAIL®



1629 By-Pass 72 NE
GREENWOOD, SC 29649

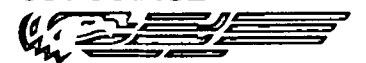


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FIRST-CLASS



US POSTAGETM PITNEY BOWES



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APR 01 2022

C T Corporations System
2 Office Park Court, Suite 103
Columbia, South Carolina 29223

Jon E. Newlon
email:
jnewlon@mccravylaw.com



Respond to: ■
Greenwood Office:
1629 Bypass 72 NE
Greenwood, SC 29649
(864)388-9100
(864)388-9104 - Facsimile

April 1, 2022

VIA FIRST CLASS U.S. MAIL
CERTIFIED, RETURN RECEIPT

C T Corporations System
2 Office Park Court Suite 103
Columbia, South Carolina 29223

Re: Sarah Moseley vs. Wal-Mart Stores, Inc., d/b/a Store #6887
C.A. No. 2022-CP-24-00284

Dear Sir or Madam:

Please be advised that our firm has been retained to represent Sarah E. Moseley in the above referenced matter. According to the South Carolina Secretary of State you are listed as the Registered Agent for Wal-Mart Stores, Inc.

Enclosed and as service upon Wal-Mart Stores, Inc. through their Registered Agent, please find *Summons & Complaint*. Please handle accordingly.

Thank you for your cooperation in this regard.

Kind regards,

McCRAVY, NEWLON, STURKIE & CLARDY
LAW FIRM, P.A.


Jon E. Newlon, Esquire

JEN/
Enclosures

cc: Sarah E. Moseley

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF GREENWOOD)	EIGHTH JUDICIAL CIRCUIT
Sarah Moseley,)	
)	
Plaintiff,)	SUMMONS
)	
vs.)	22 - CP - 24 - _____
)	
Wal-Mart Stores, Inc., d/b/a Store #6887,)	
)	
Defendant.)	
_____)	

TO: THE DEFENDANT:

THIS SUMMONS requires you to answer the attached Complaint and to serve a copy of your Answer on Plaintiffs' attorneys at their office, 1629 Bypass 72 NE, Greenwood, South Carolina 29649, within THIRTY (30) DAYS after service of this Summons, excluding the date of service, and if you fail to answer the Complaint within this time, judgment by default will be rendered against you for relief demanded in the Complaint.

McCRAVY NEWLON & STURKIE
LAW FIRM, P.A.

BY: s/Jon E. Newlon
Jon E. Newlon
State Bar #15617

Attorney for the Plaintiff
1629 ByPass 72 NE
Greenwood, S.C. 29649
864/388-9100, 9104 (FAX)
jnewlon@mccravylaw.com

Greenwood, South Carolina
March 28, 2022

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
)
 COUNTY OF GREENWOOD) EIGHTH JUDICIAL CIRCUIT

Sarah Moseley,)

Plaintiff,)

vs.)

Wal-Mart Stores, Inc., d/b/a Store #6887,)

Defendant.)

COMPLAINT

22 - CP - 24 - _____

Plaintiff, complaining of Defendant, respectfully allege as follows:

1. Plaintiff is a citizen and resident of Greenwood County, South Carolina.
2. Defendant Wal-Mart Stores, Inc., a domestic for profit corporation in good standing, is doing business as Wal-Mart Store #6887, is organized and existing under the laws of Delaware, and maintains a principle place of business in Greenwood County, South Carolina. Further, Defendant regularly transacts business in Greenwood County, South Carolina. Further, Defendant committed tortious acts through its agents and/or employees in Greenwood County, South Carolina.
3. On April 8, 2019, Plaintiff lawfully entered and occupied Defendant's place of business located at 300 Bypass 25 NE, Greenwood, S.C., 29646. Before her arrival, Defendant had put out racks near an entrance/exit. The racks were full of plants. The racks were on wheels and could be locked so they would not roll. A rack to the left of an exit did not have the wheels locked. Plaintiff had physical limitations and required a cane to ambulate. As she was exiting Defendant's store and walking to the right of a rack with plants, the wind picked up and caused the rack to rapidly roll in her direction. She tried to get out of the way but was not able to do so because of her physical limitations. The rack struck her, made her lose her balance and she fell to the pavement, thereby sustaining personal injuries and other damages.

4. As a result of Defendant's negligence, Plaintiff fell and suffered injuries and other damages.

5. At all times herein, Defendant's agents and/or employees had a duty to maintain its equipment in a safe and secure position and/or a duty to warn Plaintiff of a known unsafe condition.

6. At the time and place of the accident referred to above, Defendant had actual or constructive notice of the dangerous condition, but was negligent, grossly negligent and reckless as follows:

- a. It allowed the unlocked or broken rack to occur and remain in an area designed to accommodate customers;
- b. It allowed and/or permitted the rack to be defective, dangerous and unsafe for the Plaintiff and other customers and shoppers;
- c. It failed to correct the unlocked rack or broken rack;
- d. It failed to properly maintain the rack in a safe condition for customers using the facilities of the store;
- e. It failed to properly monitor and/or inspect the rack in question;
- f. It failed to provide an adequate sign, notice or warning of the unlocked or broken rack for Plaintiff; and
- g. In otherwise failing to use due care in keeping the rack in a reasonable and safe condition.

7. As a direct and proximate result of the Defendant's negligence, gross negligence and recklessness, Plaintiff was knocked to the ground and sustained acute personal injuries and incurred travel expenses for medical treatment and medical expenses when treated by medical doctors, both in the past and into the future. She has endured and will endure pain and suffering and other damages.

8. Plaintiff believes she is entitled to judgment for actual and punitive damages.

WHEREFORE, Plaintiff prays for judgment for negligence as well as an award of actual damages and punitive damages, for cost of this action, and for such other and further relief as this Court may deem just, equitable and proper.

McCRAVY NEWLON & STURKIE
LAW FIRM, P.A.

BY: s/Jon E. Newlon
Jon E. Newlon
State Bar #15617

Attorney for the Plaintiff
1629 ByPass 72 NE
Greenwood, S.C. 29649
864/388-9100, 9104 (FAX)
jnewlon@mccravylaw.com

Greenwood, South Carolina
March 28, 2022